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October 16, 2015

Ms. Jodi Powell Project Officer U.S. Environmental Protection Agency 1595 Wynkoop Street Denver, CO 80202-1129

Project: RAC Contract Number EP-W-05-049

Work Assignment Number 357-TATA-A882

Subject: Work Plan for Technical Assistance, Anaconda Aluminum Plant Proposed

Superfund Site, Columbia Falls, MT

Dear Ms. Powell:

CDM Federal Programs Corporation (CDM Smith) is pleased to submit this work plan for work assignment (WA) number 357-TATA-A882 to provide technical assistance to the U.S. Environmental Protection Agency (EPA) for document review of the Anaconda Aluminum Plant Proposed Superfund Site (Site) proposed remedial investigation and feasibility study (RI/FS) work plan, sampling and analysis plans (SAPs), and supporting documents. This work plan summarizes the details for performing the tasks as described in the work assignment form (WAF), dated September 24, 2015. This work plan includes assumptions, costs, and personnel for the support discussed in the scope of work provided with the WAF. In accordance with the conflict of interest (COI) screen performed for this site, there are no current or perceived COI at the time of this submittal.

This letter work plan is organized in the following sections:

- Key Assumptions
- Task 1 Project Planning and Support
- Task 2 Technical Assistance
- Task 3 Work Assignment Closeout
- Project Deliverables
- Project Personnel

Key Assumptions

The total cost, including fee, for the Site support is shown in the attached cost spreadsheets. The WA was initiated by CDM Smith according to the statement of work (SOW) provided on



September 24, 2015 for 357-TATA-A882 requesting technical support for the Site. The period of performance (POP) for this WA extends through September 27, 2016. This work plan response covers work performed September 24, 2015 to September 27, 2016 (12 months). Key assumptions used to estimate the budget to complete EPA's SOW are presented in the following sections.

Task 1 - Project Planning and Support

1.1 Develop and Negotiate Work Plan

This activity includes attending a scoping meeting; preparation of this work plan, which describes how CDM Smith will perform the tasks assigned, planning assumptions, staff, and overall management strategy; and negotiating and preparation of a revised work plan. This work plan presents the associated costs for travel, other direct costs (ODCs), and other supporting details sufficient for EPA to evaluate the costs for the project.

This subtask includes hours for a scoping meeting, which was held on September 25, 2015 with the EPA Work Assignment Manager (WAM) in Libby, MT to discuss the technical aspects of the work plan. This subtask also includes hours for a work plan negotiation meeting with EPA and preparation of a revised work plan, if necessary. CDM Smith assumes the negotiation meeting will take place via conference call.

Subcontractor costs, supplies, equipment, or travel are not anticipated for this subtask. CDM Smith's estimate to complete the work for this subtask is 33 professional level of effort (PLOE) and \$3,839.

1.2 Project Management

CDM Smith will perform WA project management throughout the POP, including monitoring costs and progress, preparing and submitting monthly progress reports, participating in meetings with the EPA WAM, tracking costs, invoicing, tracking site-specific equipment, and providing overall contract management. The following project management functions will be completed over 12 months from September 24, 2015 through September 27, 2016.

General Project Management – The project manager (PM) and program manager (PgM) will perform weekly project management and cost-tracking activities, attend internal project meetings, support the WAM, and coordinate staff and operational issues. The PgM is budgeted 1 hour per month, and the PM is budgeted 2 hours per week over the POP of 52 weeks to complete this subtask. Also, the PM is budgeted 4 hours and 2 hours for the financial manager at the project startup to build project financial tracking spreadsheets. This subtask will require a total of 122 hours of PLOE.



Monthly Project Status Report (MPSR) – Communication of expenditure versus completion rate will be performed monthly and requires a total of 3 hours per month over the POP of 12 months. Progress will be communicated through expenditure burn charts, schedule updates, detailed incurred and projected costs, and a summary of anticipated problems needing resolution. The MPSR will be prepared by the PM and reviewed by the financial manager prior to submittal. Invoice processing and report generation, copying, and word processing support will be provided by the finical manager. Invoices paid for all costs billed to the EPA will be maintained by CDM Smith and available for review by the EPA. This activity also includes managing, tracking, and reporting status of site-specific equipment. Preparing MPSRs will require a total of 36 hours of PLOE.

<u>Meetings</u> – CDM Smith will update the EPA WAM on WA progress during one meeting every month (over a 12-month period). The 12 meetings will be attended by the PM and held at the Libby Information Center. These meetings will require a total of 12 hours of PLOE, including preparation time, assuming approximately 1 hour per meeting. CDM Smith assumes all meetings with the WAM will take place in Libby, MT; therefore, travel is not included in this subtask.

Hours for project management activities are anticipated to cover the entire duration of the WA POP. CDM Smith does not anticipate additional PM time for additional technical support subtasks that may be added during the current POP.

Subcontractor costs, travel, supplies, or equipment are not anticipated for this subtask. CDM Smith's estimate to complete the work for this subtask is 170 PLOE hours and \$19,354.

1.3 Quality Assurance (QA)

CDM Smith has established a formal QA program in compliance with American National Standards Institute/American Society for Quality E4-2014, *Quality Management Systems for Environmental Information and Technology Programs – Requirements with Guidance for Use*; EPA QA/R-2, EPA Requirements for Quality Management Plans; EPA QA/R-5, EPA Requirements for Quality Assurance Project Plans; and EPA QA/G-5, Guidance for Quality Assurance Project Plans to ensure consistently high quality in project deliverables under the EPA Remedial Action Contract (RAC). Work performed by CDM Smith on this WA will be conducted in accordance with the contract-specific Quality Management Plan Revision 3, July 2015. Documents and deliverables, such as this work plan, will receive a QA review before transmittal to EPA.

Based on the number of PLOE hours being less than 500 for this WA, one office self-assessment will be performed by CDM Smith's local QA specialist at the discretion of the CDM Smith QA Manager. QA activities will be documented and maintained in the project file.

No subcontractor costs, supplies, or equipment are anticipated for this subtask. CDM Smith's estimate to complete the work for this subtask is 2 PLOE hours and \$279.



Task 2 - Technical Assistance

2.1 Technical Assistance

As part of this task, CDM Smith will support the EPA by performing technical review and comment on the potentially responsible party (PRP) draft RI/FS work plan, Phase 1 site characterization SAP, and subsequent revisions. All reviews will have comments delivered to the EPA in technical memorandum format, with comments organized by respective sections of the documents. Additionally, CDM Smith will assist the EPA during an onsite work plan discussion with the PRP. The PLOE for this subtask is based on the following assumptions:

- Due to the aggressive review schedule, CDM Smith will utilize a multi-disciplinary team to complete the initial review of the RI/FS work plan and SAP and provide comments by October 5, 2015.
- An internal CDM Smith project kickoff meeting was held with technical reviewers to discuss project details, deliverable schedule, and review comment format.
- Review of historic documents provided in the appendices of the RI/FS work plan prior to document review and comment.
- Complete an EPA QA crosswalk table to confirm EPA guidelines were followed during SAP development.
- Complete a crosswalk table to verify requirements of the Administrative Order on Consent was addressed in the work plan and SAP.
- Two additional document review and comment sessions for the RI/FS work plan and SAP are included and will be performed as requested by the EPA.
- Provide a clerical level administrative professional to support document preparation and scheduling for RI/FS and SAP document review meetings. The LOE for the task will be 1 hour per week over 52 weeks.

Costs associated with this subtask include administrative costs and printing of meeting materials. CDM Smith's estimate to complete the work for this subtask is 119 PLOE hours and \$23,163.

2.2 Meetings

CDM Smith will support EPA by attending meetings with the PRP. The PLOE for this subtask is based on the following assumptions:



- Attend two separate meetings with the EPA and PRP to review and discuss comments to the RI/FS work plan and SAP documents. CDM Smith assumes all meetings will be held in Columbia Falls, MT.
- Conduct two separate 4-hour meetings with the EPA prior to meeting with the PRP to discuss team comments.
- Eight hours (4 per meeting) are included to complete action items assigned by the WAM during the two meetings with the PRP.
- Travel costs for this subtask include rental vehicles, fuel, lodging and per diem, and miscellaneous incidentals.

Costs associated with this subtask include travel costs. CDM Smith's estimate to complete the work for this subtask is 60 PLOE hours and \$7,872.

Task 3 – Work Assignment Closeout 3.1 Work Assignment Closeout

EPA will notify CDM Smith when the activities required for the WA are complete and WA closeout should be prepared. Following the notification, CDM Smith will provide an estimate of final costs, including amount of funding allocated to the WA; approved budget; all costs that had been incurred completing the activities required by this WA; all costs incurred but not invoiced; the anticipated cost to close out the WA, such as copying, shipping, and other administrative records; and final project total costs.

If requested, CDM Smith will provide a document list for this WA for review by the WAM for duplication check. CDM Smith will provide EPA with additional copies of project documents upon request either in electronic or hard copy format. CDM Smith also will return any documents to EPA or other document repositories as applicable. CDM Smith will complete administrative activities as defined in the contract for file retention, which include file archiving to meet Federal Center requirements, distribution, and storage. CDM Smith will prepare and submit with the final invoice an accounting of costs and PLOE by subtask and compare it to the projected budget.

Subcontractor costs, travel, supplies, or equipment are not anticipated for this subtask. CDM Smith's estimate to complete the work for this subtask is 20 PLOE hours and \$2,546.

Project Deliverables

CDM Smith will submit the following deliverables:



Subtasio	Deliverable	Submittal Date
1.1	Work plan	October 16, 2015
1.3	Scoping meeting	September 25, 2015
1.4	Negotiated work plan	To be determined
1.2	Monthly progress reports	Monthly
2.1	Original document review and comments	October 5, 2015
2.1	Subsequent reviews and comments	To be determined
3.1	WA Closeout Report	September 27, 2016

Project Personnel

A multi-disciplinary team has been organized to provide technical expertise for the WA. CDM Smith personnel proposed at this time and their responsibilities involved with the project are presented below.

Program Support Staff

PgM PM

Financial manager

Project Support Staff

Lead risk assessment technical reviewer
Lead technical reviewer
Technical reviewer
Technical reviewer
Local QA coordinator
Technical reviewer
Technical reviewer
Editorial reviewer

PBI / Ex. 4

It is assumed the above staff will work on the project. This assumption is subject to change based on scheduling factors. If a staff member identified in this work plan is not available, every attempt to find a staff member with similar technical experience will be made.

Program Management

Administrative assistant

CDM Smith's estimate to complete the program support associated with this work plan is 18 PLOE hours and \$2,567.



Business Confidentiality

This work plan amendment includes data that shall not be disclosed outside the government and shall not be duplicated, used, or disclosed -- in whole or in part -- for any purpose other than to evaluate the work plan. The government shall have the right to duplicate, use, or disclose the data to the extent provided in RAC number EP-W-05-049. The restriction does not limit the government's right to use information contained in this document if it is obtained from another source without restriction. This restriction applies to all data in this proposal.

It is our understanding that upon your approval of the option period scope and budget presented in this work plan, a WAF modifying the expenditure limit of the WA will be issued.

If you have any questions or comments, please feel free to call me at (303) 383-2355. We look forward to our continued support to EPA on this contract.

Sincerely,

Kristine E. Chapman, PMP CDM Federal Programs Corporation

Attachments

cc: Wallace Sermons, EPA Contracting Officer
Tia Gatling, EPA Contract Specialist
Mike Cirian, EPA WA Manager
Talia Zaczkowski, CDM Smith Financial Manager
Damon Repine, CDM Smith Project Manager
RAC8 Contract Files

CDM FEDERAL PROGRAMS CORPORATION **COST ESTIMATE SUMMARY**

Work Assignment No.: 357-TATA-A882 Site Name: Columbia Falls Project Manager: Damon Repine

LABOR

SUBCONTRACTORS

TOTAL COSTS

Contract: EP-W-05-049 Status: Original Date: October 16, 2015

EXHIBIT A

EXHIBIT D

PBI / Ex.

OTHER DIRECT COSTS EXHIBIT B **PBI / Ex. 4**

TRAVEL EXHIBIT C **PBI / Ex. 4**

PBI / Ex. 4

PBI / Ex. 4

Base Fee Calculation: The base fee is calculated as follows: base rev Calculation. The base tee is calculated as rollows.

Fee on LOE, excluding Program Support Allocation (LOE multiplied by \$8.06/LOE Hour), plus

Fee on unburdened subcontracting pool (subcontracting pool multiplied by .0471), plus

Fee on subcontractor overhead applied to unburdened subcontracting pool (subcontracting pool multiplied by subcontractor overhead rate multiplied by .0471), plus

Fee on G&A applied to subcontractor overhead on unburdened subcontracting pool (subcontractor overhead multiplied by G&A rate multiplied by .0471)

Program Support Allocation applied to total PLOE/Costs minus fully burdened subpool



Task Summary - Totals

Work Assignment No.: 357-TATA-A882

Project Manager: Damon Repine

Site Name: Columbia Falls

Contract: EP-W-05-049
Status: Original

Date: October 16, 2015

Task TASK Total PLOE Labor Subcontractor Description CODE Hours (1) ODCs (2) Equipment Travel Subcontractor Overhead G&A Fixed Fee **Total Cost** No. Costs

PBI / Ex. 4

(1) Total PLOE = sum of CDM Federal Programs Corporation and team subcontractor professional labor hours

(2) ODCs = sum of mail/delivery and supplies



Exhibit A - CDM Federal Programs Corporation Labor Costs

Work Assignment No.: 357-TATA-A882

Site Name: Columbia Falls

Project Manager: Damon Repine

Contract: EP-W-05-049

Status: Original

Date: October 16, 2015

PBI / Ex. 4



EXHIBIT A-1: LABOR MATRIX

Work Assignment No.: 357-TATA-A882

Site Name: Columbia Falls **Project Manager:** Damon Repine

Contract: EP-W-05-049 Status: Original

Date: October 16, 2015

PBI / Ex. 4



Exhibit B: OTHER DIRECT COSTS

Work Assignment No.: 357-TATA-A882

Site Name: Columbia Falls

Project Manager: Damon Repine

Contract: EP-W-05-049

Status: Original

Date: October 16, 2015

PBI / Ex. 4

(1) See Exhibit B-1 for Supplies and Equipment Rental.



Exhibit C: TRAVEL COSTS

Work Assignment No.: 357-TATA-A882 Contract: EP-W-05-049 Site Name: Columbia Falls Status: Original Project Manager: Damon Repine

Date: October 16, 2015

Task		Airfare	Hotel	Per Diem	Rental Car	Personal Car	Other/Car	Total				
No.	Description	Cost	Cost	Cost	Cost	Cost	Cost	Cost				
	PBI / Ex. 4											

- (1) Transportation cost represents the lowest cost air fare currently available.
- (2) Lodging, per diem, and mileage are in accordance with CONUS rates.
- (3) Other/Car includes expenses for parking, tolls, and shuttles.
- (4) See Exhibit C-1 for details.



Confidential Business Information

Exhibit C-1: Travel Cost Backup

Work Assignment No.: 357-TATA-A882 Site Name: Columbia Falls Project Manager: Damon Repine

Contract: EP-W-05-049 Status: Original Date: October 16, 2015

				No.	Total		Airfare (1)		Hotel (2)		Per Diem (2)		Rental Car		Personal Car (2)			
Task	Locat	tion	Purpose	of	No. of	Days/	Unit	Total	Unit	Total	Unit	Total	Unit	Total	No of	Total	Other/Car	Total
No.	From	То		Staff	Trips	Trip	Cost	Cost	Cost	Cost	Cost	Cost	Cost	Cost	Miles	Cost	Cost (3)	Cost

PBI / Ex. 4

(1) Transportation cost represents the lowest cost air fare currently available.

(2) Lodging, per diem, and mileage are in accordance with CONUS rates.

(3) Other/Truck is fuel for rental truck



Confidential Business Information

RAC REGION VIII - Contract No. EP-W-05-049 CDM SMITH
Work Assignment No.: 357-TATA-A 357-TATA-A882 Work Assignment Name: Columbia Falls

CDM Federal Programs Corporation Escalation Factor and Labor Rates

START DATE: END DATE: 9/24/2015 9/27/2016

DURATION 12.13 MONTHS CDM FEDERAL PROGRAMS CORPORATION LABOR RATE CALCULATION

9/24/2015 9/27/2016 3/26/2016 4/5/2015 START DATE: MIDPOINT: LABOR QUARTER: ESCAL MONTHS:

LAROR ESC. FACTOR. 1.0300.

 \leftarrow Escalation \rightarrow

PBI / Ex. 4



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